

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
FRANCHISE GROUP, INC., et al.,  Debtors.	Case No. 24-12480 (JTD) (Jointly Administered)
	<b>Hearing Date: TBD</b> <b>Objection Deadline: TBD</b>

**NOTICE OF MOTION OF THE AD HOC GROUP OF FREEDOM LENDERS FOR  
ENTRY OF AN ORDER (I) TERMINATING EXCLUSIVITY  
IN THE HOLDCO DEBTORS' CASES, (II) LIFTING  
THE AUTOMATIC STAY IN THE HOLDCO DEBTORS' CASES, OR  
(III) APPOINTING A CHAPTER 11 TRUSTEE FOR THE HOLDCO DEBTORS**

**PLEASE TAKE NOTICE** that the Ad Hoc Group of Freedom Lenders (the “Freedom Lender Group”) filed the *Motion for Entry of an Order (I) Terminating Exclusivity in the Holdco Debtors’ Cases, (II) Lifting the Automatic Stay in the Holdco Debtors’ Cases, or (III) Appointing a Chapter 11 Trustee for the Holdco Debtors* (the “Motion”)<sup>1</sup> with the United States Bankruptcy Court for the District of Delaware (the “Court”) seeking entry of an order requesting various relief, as set forth more fully in the Motion. **YOUR RIGHTS MAY BE AFFECTED BY THIS MOTION.** Accordingly, you should read this notice and the Motion.

**PLEASE TAKE FURTHER NOTICE** that any objection to the Motion must be filed on or before **TBD, at 4:00 p.m. (prevailing Eastern Time)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801, and served on the undersigned counsel so as to be received on or before the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that a hearing to consider the Motion will be held on **TBD (prevailing Eastern Time)** before the Honorable John T. Dorsey in the United

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE that the Court may grant the relief requested in the Motion without further notice or a hearing if you fail to respond to the Motion in accordance with this notice.** Copies of the Motion and other filings in this chapter 11 case can accessed for free at <https://cases.ra.kroll.com/FRG/>.

*[Remainder of Page Intentionally Left Blank]*

Dated: November 20, 2024

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

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*Counsel for Ad Hoc Group of Freedom Lenders*